

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

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|--------------------------|---|
| UNITED STATES OF AMERICA |) |
| |) |
| |) |
| v. |) |
| |) |
| |) |
| SAMNANG AM |) |
| Defendant. |) |
| |) |

GOVERNMENT'S REQUESTED QUESTIONS FOR THE JURY VENIRE

The United States of America, by its undersigned attorneys, hereby requests that, in addition to those questions commonly put to the venire in cases commenced in this Court, the Court pose the following questions to the prospective jurors in this case:

1. The United States of America is one of the litigants in this trial. You will hear the United States referred to throughout the trial as "the government." Have you, or any member of your immediate family, or anyone with whom you are close:
 - (a) ever answered charges (other than for an alleged moving traffic violation) in a criminal proceeding?;
 - (b) ever filed a lawsuit or claim of any kind against any police or other law enforcement officer?;
 - (c) ever engaged in litigation with the federal government, that is, ever filed a claim or lawsuit against the United States or any of its agencies, or answered some claim made against you by the federal government?
 - (d) ever engaged in litigation with the state government or the City of Lynn, that is, ever filed a claim or lawsuit against the Commonwealth of Massachusetts or the City of Lynn or any of their agencies, or answered some claim made against you by the state government or the City of Lynn?
 - (e) ever had any involvement, of any sort other than a routine traffic matter, with the any area police department, with the Lynn Police, the Massachusetts State Police or the Bureau of Alcohol, Tobacco, Firearms and Explosives, known as the "ATF"?

(f) ever been treated unfairly by any police officer or other law enforcement personnel?

2. Aside from these particular circumstances, are you aware of any prejudice which you may have against the federal government, the Commonwealth of Massachusetts, the City of Lynn, the Lynn Police Department, the Massachusetts State Police, or ATF which would in any way impair your ability to evaluate and judge fairly and impartially the facts of this case?

3. Some of the witnesses expected to be called by the United States at trial are officers with the Lynn Police Department, the Massachusetts State Police and Special Agents with the Bureau of Alcohol, Tobacco, and Firearms. These law enforcement officers may be called to testify as both "fact" witnesses and as "expert" witnesses. As experts, they may be called to give their expert opinion as to certain matters in this case calling for specialized knowledge and skill involving firearms, and possibly other investigative practices.

4. Are you aware of any prejudice that you might have against a witness or other individual in this case where that witness or individual is shown to be a law enforcement officer working for the Lynn Police Department, the Massachusetts State Police Department or the ATF?

5. Portions of the evidence in this case are going to concern events that the government alleges took place on Essex Street in Lynn, Massachusetts. Are you familiar with that location? If so, will you be able to put aside whatever information you know about the area and base your decision solely on the evidence?

6. Are you willing and able to completely and honestly apply the law, as I give it to you at the end of the case, to the facts as you find them? Do you know of any reason why you cannot sit as a fair and impartial juror in the trial of this case?

7. Do you have any strong feelings regarding firearms or government regulation of firearms that would effect your ability to sit as a fair and impartial juror in this case? Are you or any member of your family a member of an organization that advocates either gun ownership or advocates restrictions on the use and ownership of firearms?

Dated: May 4, 2007

Respectfully submitted,

MICHAEL J. SULLIVAN
UNITED STATES ATTORNEY

By: */s/ Lisa M. Asiaf*
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on May 4, 2007.

/s/ Lisa M. Asiaf
LISA M. ASIAF
Assistant U.S. Attorney